

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ILLINOIS UNION INSURANCE COMPANY	)	CIVIL ACTION
as subrogee of CITY OF LAWRENCE	)	
	)	NO.04-10475 MLW
Plaintiff,	)	
	)	
v.	)	
	)	
THE VIKING CORPORATION	)	
	)	JURY TRIAL DEMANDED
Defendant.	)	

DEFENDANT THE VIKING CORPORATION RULE 16.1(D)(3) CERTIFICATION

We, the undersigned, hereby certify that we have conferred in this matter:

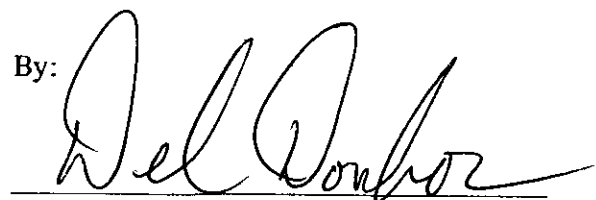
(a) with a view to establishing a budget for the costs of conducting the full course and various alternative courses of the litigation; and

(b) to consider the resolution of the litigation through the use of alternative dispute resolution programs, such as those outlined in Local Rule 16.4.

Respectfully submitted,

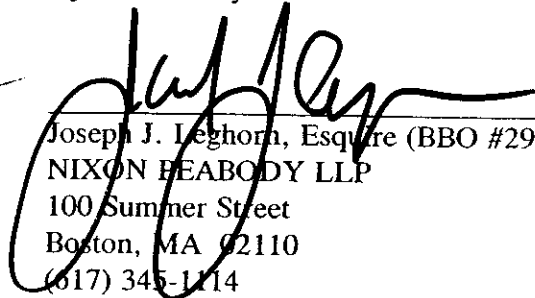
THE VIKING CORPORATION

By:



Del Dornbos  
Vice President, Technical Services  
Viking Group, Inc.

By Its Attorney:



Joseph J. Leghorn, Esquire (BBO #292440)  
NIXON PEABODY LLP  
100 Summer Street  
Boston, MA 02110  
(617) 345-1114

Dated: January 4, 2005